



DEPARTMENT OF HEALTH AND ENVIRONMENT

Forbes Field

Topeka, Kansas 66620-0001

Phone (913) 296-1500

Mike Hayden, Governor

August 20, 1988

Stanley C. Grant, Ph.D., Secretary

Gary K. Hulett, Ph.D., Under Secretary

RECEIVED

SEP 12 1988

RCOM SECTION

Mr. David Trombold
Sales Manager
Conservation Services/Hydrocarbon Recyclers, Inc.
2525 North New York
Wichita, KS 67219

Re: Hazardous Waste Compliance Inspection
EPA ID number KSD007246846

Mr. Trombold:

On June 28, 1988, an inspection of your TSD facility was conducted by this department to determine compliance with state and federal regulations concerning hazardous waste.

The inspection revealed that your facility generates the following hazardous wastes as defined by 40 CFR 261:

	Wastes Generated	Waste Codes
1.	chlorinated solvents	F001, F002
2.	perchloroethylene-contaminated dry cleaning cartridges	F001
3.	sparged carbon and condensate from sparging unit	F001
4.	listed solvents and solvent-paint mixtures	F003, F005
5.	ignitable solvents and solvent-paint mixtures	D001
6.	paint solids	D005, D006, D007, D008

The quantity of hazardous waste generated is more than 1000 kilograms (approximately 2200 pounds) per month. Your facility is, therefore, regulated under 40 CFR, Part 262 as adopted by K.A.R. 28-31-4. In addition to being an EPA generator, your facility is regulated as a TSD under interim status, and is subject to 40 CFR 265 (K.A.R. 28-31-8).

The inspection identified the following items not in compliance with regulations concerning generators of hazardous waste; and hazardous waste treatment, storage, and disposal (TSD) facilities:

1. Some of your customers are noting F005 waste as D001 waste on the manifests. For example, 40 drums of waste paint solvent from Wilko Paint were shipped as D001 waste on manifest #00021 dated 2-12-88. It is



R00001616
RCRA Records Center

especially important the correct codes be used because 'F' listed solvents are now subject to the land disposal ban.

2. You must comply with the manifest and recordkeeping requirements under 40 CFR 265 Subpart E. No final TSD signature was exhibited on manifest #00205, dated 4-20-88, from DRMO-Robbins.
3. No land ban notice accompanied manifest #00004, dated 1-20-88, from Powell Body Works. You should make every attempt to ensure shipments from your customers are in compliance with the 40 CFR 268 standards.
4. The notation "dike around tank broken" appeared on an inspection log dated 4-12-88. No remedial action was noted on subsequent logs. 40 CFR 265.15 requires remedial action to be noted on the logs.
5. You must manage your containers in accordance with the requirements of 40 CFR 265 Subpart I, as referenced by K.A.R. 28-31-8. Containers of hazardous waste must be kept closed except when adding or withdrawing waste. During the inspection, I observed two open drums containing solvent waste at the blender/disperser area, one open drum of perc-contaminated condensate in the sparging room, and one open drum of perc-contaminated filters and carbon in the sparging room.
6. 40 CFR 265 Subpart I also requires containers of hazardous waste be in good condition and be marked with the words "Hazardous Waste". In warehouse C, I observed one severely dented 5 gallon container of waste flammable solvent; and, in the blender area, I noted a bulged container of hazardous waste from the Iowa Army Ammunition Plant. You also had a drum from Koch Refining in warehouse C that was not labeled.
7. For full compliance with 40 CFR 265 Subpart D, your contingency plan should include the home addresses of the emergency coordinators.
8. A new closure plan (addressing the new hazardous waste storage and processing tanks) needs to be drawn up. This is required under 40 CFR 265 Subpart G.
9. You had several containers of hazardous waste in storage in the sparging room. Some of these had been stored more than 3 days past the date they were filled. This is a violation of the satellite accumulation allowance found in 40 CFR 262. Once 55 gallons of hazardous waste is accumulated at a satellite accumulation point, you have 3 days to move it to either your interim status storage area or a designated 90 day storage area.
10. Since you are handling your dry cleaning cartridge paper as hazardous waste, you must store them in appropriate containers. During the time of inspection, these were just stacked against the wall in the sparging room.

Because of the discoloration on the ground and other evidence of spillage at the acid unloading area, I strongly recommend a curbed, impermeable slab be installed. Any acid unloading or transfer should take place on this pad. It

Mr. David Trombold
August 20, 1988
Page #3

3

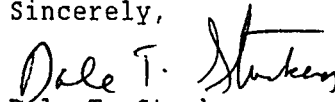
is understood this applies to the Service Chemical area and is not linked to the CSI-HRI operation.

By October 25, 1988 please send me written documentation verifying the above items have been corrected. This should include:

- A copy of your revised emergency coordinator list.
- A copy of your revised closure plan.

Your cooperation with the Hazardous Waste Management Program is appreciated. If you have questions concerning the inspection, please call me at (316) 651-5529.

Sincerely,



Dale T. Stuckey
Inspections and Enforcement Section
Bureau of Waste Management

cc: Tom Gross
J.P. Goetz

STATE OF KANSAS



DEPARTMENT OF HEALTH AND ENVIRONMENT

Forbes Field

Topeka, Kansas 66620-0001

Phone (913) 296-1500

Mike Hayden, Governor
RCRA COMPLIANCE INSPECTION REPORT GENERATORS AND TRANSPORTERS CHECKLIST
 Gary K. Hulet, Ph.D., Under Secretary

A. General

Date 6/28/88 Time 0930 EPA ID No. KSD007246846
 Facility Name Conservation Services--Hydrocarbon Recyclers, Inc
 Street 2525 New York
 City Wichita, Kansas Zip 67219
 County Sedgwick Phone (316) 267-5742
 Contacts David Trombold--Sales Manager
 Inspector Dale T. Stuckey and Martin West
 Other 10 employees

B. Hazardous Waste Determination

1. Does generator generate waste(s) listed in 261.31, 261.32,
 or 261.33? ((YES))NO

EPA Hazardous Waste No.	Describe Waste Material	Quantity/Month	Method of Disposal
F001,F003,F005,D001	solvent-based waste blended for kiln fuel	771,000 lbs in '87	General Portland
F001,F002	chlorinated solvent for distillation	104,400 lbs in '87	H.R.I. Oklahoma
F002	perchloro-ethylene contaminated solids for incineration	6,450 lbs in '87	Rollins
F002	dry cleaning car-tridge carbon	6,250 lbs in '87	?
F005,D001,D008	paint solids for incineration	10,816 lbs in '87	Rollins
F003,F005,D001	non-chlorinated solvents for distillation	136,100 lbs in '87	H.R.I.-Oklahoma
F001,F002	wastewater for deep well injection	10,400 lbs in '87	H.R.I.-Oklahoma
F002	dry cleaning cart. and paper	?	incineration or kiln fuel

2. Does generator generate waste(s), not listed, that exhibit hazardous characteristics (corrosivity, ignitability, reactivity, EP toxicity)? ((YES))NO

- a. If yes, list waste(s), EPA Hazardous Waste No. according to 40 CFR, Subpart C, and quantity.

EPA Hazardous Waste No.	Waste Material	Quantity/Month	Method of Disposal
D002,D007	corrosive waste for landfill	14,665 lbs in '87	stored on site
D007,D008	wastewater and coolants for deep well injection	89,600 lbs in '87	H.R.I.
D001,D007,D008	waste solids for landfill	41,214 lbs in '87	USPCI

(Attached is a list of wastestreams they may take in the future)

- b. Does generator determine characteristics by testing or by applying knowledge of processes? Explain below:

1. If determined by testing, did generator use test method 261.21, 261.22, 261.23, 261.24 or was equivalent test method used? _____

YES NO

- a. If equivalent method used, obtain copy of test method.

3. Are there any other wastes generated by generator?

YES NO

- a. If yes, list below:

Waste Description

Disposal Method

- b. Did the generator test these wastes to determine if hazardous?

YES NO

Explain if necessary:

4. Generator size classification:

SQ (<25 kg/month)

KG (25 - 100 kg/month)

EPA SQ (100 - 1000 kg/month)

XX EPA (>1000 kg/month)

STATE OF KANSAS



DEPARTMENT OF HEALTH AND ENVIRONMENT

Forbes Field

Topeka, Kansas 66620-0001

Phone (913) 296-1500

Mike Hayden, Governor

Stanley C. Grant, Ph.D., Secretary

Gary K. Hulett, Ph.D., Under Secretary

RCRA Compliance Inspection Report

T/S/D Facilities Checklist

A. General

Date 6/28/88 Time 0930 EPA ID No. KSD007246846

Facility Name Conservation Services--Hydrocarbon Recyclers, Inc

Street 2525 New York

City Wichita, Kansas Zip 67219

County Sedgwick Phone (316) 267-5742

Contacts David Trombold--Sales Manager

Inspector Dale T. Stuckey and Martin West

Other 10 employees

B. Activity at Site

<u>Treatment</u>	<u>Storage</u>	<u>Disposal</u>
<u>Chem/Phys/Bio Treatment</u>	<u>X</u> Drums	<u>Incineration</u>
<u>Filtration</u>	<u>Pile</u>	<u>Landfill</u>
<u>Incineration</u>	<u>Surface Impoundment</u>	<u>Land Treatment</u>
<u>Recycling/Recovery</u>	<u>X</u> Tank, Above ground	<u>Surface Impoundment</u>
<u>Reprocessing</u>	<u>Tank, Below ground</u>	<u>Other ()</u>
<u>Solvent Recovery</u>	<u>Other ()</u>	
<u>Thermal Treatment</u>		
<u>Volume Reduction</u>		
<u>Waste Oil</u>		
<u>Other ()</u>		

General Information

--They are in the process of converting Building A to a lab. Once installed, all detailed and confirmation analyses will be run through it. They do not plan to have it certified since the lab will just be used for in-house purposes. The lab is slated to open in 2 months.

--The finishing touches are being put on installing the new hazardous waste storage tanks. A photo of this area is attached. The new tanks include four 7000 gallon pressurized tanks, one 7000 gallon ambient pressure tank, and two 24,000 gallon kiln fuel tanks. The two old vertical 4500 gallon storage tanks were removed yesterday.

--The new drum storage capacity of 181,000 gallons should allow storage of up to 1700 drums of hazardous waste and an additional 400-500 drums of corrosives to be stored in Building B. However, David anticipated the actual number of drums to be stored will be much less than that amount because most drums will be pumped out to one of the storage tanks shortly upon receipt at the facility.

--Building D now houses the sparging area. There are two sparging units being used. A larger capacity unit may be purchased in the future. see photos.

--No reactives or pesticides will be handled. A minimal amount of oxidizers (only Class I and II) will be taken. These will be considered D001 waste. Their special services branch will broker waste pesticides out to other disposal firms.

--A drum washer will be installed in the near future. Empty drums will then be sold.

--No hazardous wastes are handled or stored over at the Service Chemical area.

--A few drums of sparged carbon were taken recently to Aptus. The cement kiln was to run some tests and see if they could use the carbon as fuel.

--Dave did not think there are any underground tanks anywhere on the property.

--There are presently 160-200 waste customers.

--No solvent recycling takes place on-site. The distillation unit was pulled out of the Service Chemical building and is presently sitting in the field south of Warehouse C.

Manifests

--Several manifests for shipments of waste paint thinner showed this material noted as D001 waste, when it should have been noted as F005. For example:

-Wilko Paint manifest #00021 dated 2-17-88 for 40 drums of paint solvent. This waste noted as D001.

-Copeland manifest #00012 dated 3-1-88 for shipment of 4 drums of waste paint related material and 7 drums 1,1,1 tric. The paint thinner noted as D001.

-Mennonite Press manifest #00001 dated 3-10-88 for shipment of one drum (only 16 gallons in the drum) of waste benzene. Benzene was noted as D001 when it should have been F005. This firm, however, may be a small quantity generator.

-Powell Body Works manifest #00004 dated 1-20-88 for shipment of 6 drums of waste paint related material (paint thinner). The waste was noted as D001. No land ban notification accompanied this shipment.

--DRMO-Robbins AFB, GA. manifest #00205 dated 4-20-88 for shipment of a variety of wastes including F002 waste, did not exhibit a final TSD signature.

Waste Analysis

--Strata Labs are presently running most analyses. The WSU professor is no longer involved. The HRI lab in Tulsa is running any GC work.
--For each wastestream shipment received, a sample is taken from each drum and composited into one sample for confirmation analysis. These samples are run for specific gravity and pH.

Inspections

--Hazardous waste tank inspection log dated 4-12-88 included the notation "dike around tank broken". No remedial action was noted on subsequent logs.

Personnel training

--A few new people have come on board from HRI, including Steve Keiter. These employees have been on board here less than 6 months. They have previously received training at HRI.

Contingency Plan

Needs home addresses of emergency coordinators.

Closure Plan

A new closure plan and cost estimates need to be drawn up for the new hazardous waste storage tanks.

Field observations

Service Chemical area

Dave informed me that Service Chemical is now considered a totally separate company than CSI-HRI. David is one of the owners of Service Chemical.
--There is an area just north of the center of Service Chemical where the contents of sulfuric acid and nitric acid tankers are unloaded and packaged into containers. Some of this unloading takes place over bare, sandy ground. There was some evidence of spillage in this area, and evidence some of this may have run down in a small rivulet to the drainage ditch north of the fence line, on the railroad's property. See photo. I was told most of the spillage seen was actually caused by water draining out of a hose, but discoloration on the ground indicated some acid may have been spilled. The worker in this area admitted that some sulfuric and/or nitric acid is spilled from time to time. He said the greenish discoloration on the ground was not chromic acid but spillage of nitric acid or sulfuric acid. Chromic acid is only handled in a dry flake form at this facility. I recommended to Dave he install some impermeable, curbed pad in this area to prevent runoff and spillage of acid onto the ground in the future. He was receptive to this idea.

Building B

Toured here. The building did not contain any wastes at the time.

New tank storage area

See photo. The brown tank and the two kiln fuel storage tanks are unpressurized. Only one of the tanks (#3) was in use at the time. They will probably start using the two kiln fuel tanks next month. The remaining tanks will be used within the next 2 months.

Building D

--In the western end of this building several storage tanks are perched up on steel beams approx. 15' above ground floor. Some of these tanks will be used for storage of waste chlorinated solvents. Some will be used for storage of waste oil. Some will be used for storage of recycled product. None of the tanks were in use at the time.

--The sparging room is in the south portion of building D. Several sparged perc cannisters were being stored in two piles against the wall. None of these were labeled. Dave said these were to be sent to USPCI. I told Dave these need to be kept in labeled containers, and to be handled as hazardous waste. He expressed surprise at this. He did not believe the paper filters remaining in the cannisters posed a problem. I referred him to Tom Gross's letter of March 4, 1988, where it was stipulated the paper filters had to be handled as hazardous.

A drum for collecting steam condensate was situated under the steam condensate line at each sparging unit. These drums were open. I told Dave they should have some kind of lid. One of the drums was empty, the other was 1/3 full of condensate.

There was also an open drum of sparged filters and carbon against the south wall. Another 4 drums of unsparged carbon were located in this area. They were properly labeled.

A question arose as to how the satellite accumulation rule applies to an area such as this. Dave said drums were probably kept over 3 days from the time of being filled at this location. In the future, after being filled, these drums will be transferred over to Building B which will be one of the designated storage areas on the permit.

Warehouse C (outside)

--The blender/disperser area was located just outside at the southeast corner. The blender was not being used because the storage tanks were not yet available for storage of the blended waste.

Two open drums of hazardous waste were in this immediate area. One was located just underneath the blender. A little further west in the staging area, was a bulged drum from the Iowa Army Ammunition Plant. Manifest #88031. I was told this was just received yesterday and they would be repackaging it into a salvage drum.

A USPCI gondola was set just south of the blender area. Workers were in the process of dumping containers of hazardous waste approved for landfilling out into the gondola. This material appeared to be such things as fuel oil-soaked straw and used absorbant pads.

Warehouse C (inside)

James Hamilton--Plant Foreman (moved here from HRI) accompanied us on our tour of the Warehouse C area.

Some 1600 drums of hazardous waste were located in warehouse C. The drums were split up by 6" high curbing into separate areas (see photos). Acid corrosives were stored in a separate curbed area at the west end; alkaline corrosives were stored in a separate curbed area at the east end. Most of the flammables were stored towards the west end.

Some of the problems found:

- At least 5 severely dented containers.
- One drum marked Koch Refinery, Corpus Christi, without hazardous waste label, date, or any other identification.

After the inspection,
Martin West and I split with CSI on sampling soil in old process/
blending area where concrete had been pulled up to install
new blending area. Samples were pulled from four different
spots at a depth of approx. 14 inches. Samples were taken for
VOC and heavy metal analyses. Our samples were composited from
these four points.

Department of Health and Environment
Division of Environment
Northcentral District Office, St. Anna
P H O T O M O U N T I N G S H E E T

Name of Site: Conservation Services

Location: City Wichita : County SG Legal: _____ S-____, T-____, S, R _____ E
W



Photo No. _____ Time: 6/28/88 Hrs.

Date: 6/28/88 Day: _____

By: Dale T. Stuckey

General Direction Faced: North

Weather Conditions: _____

Type of Camera: _____

Minolta Freedom III

Comments: _____

View of spillage
at acid unloading area -
Service Chemical. Small
drainage just beyond
fence

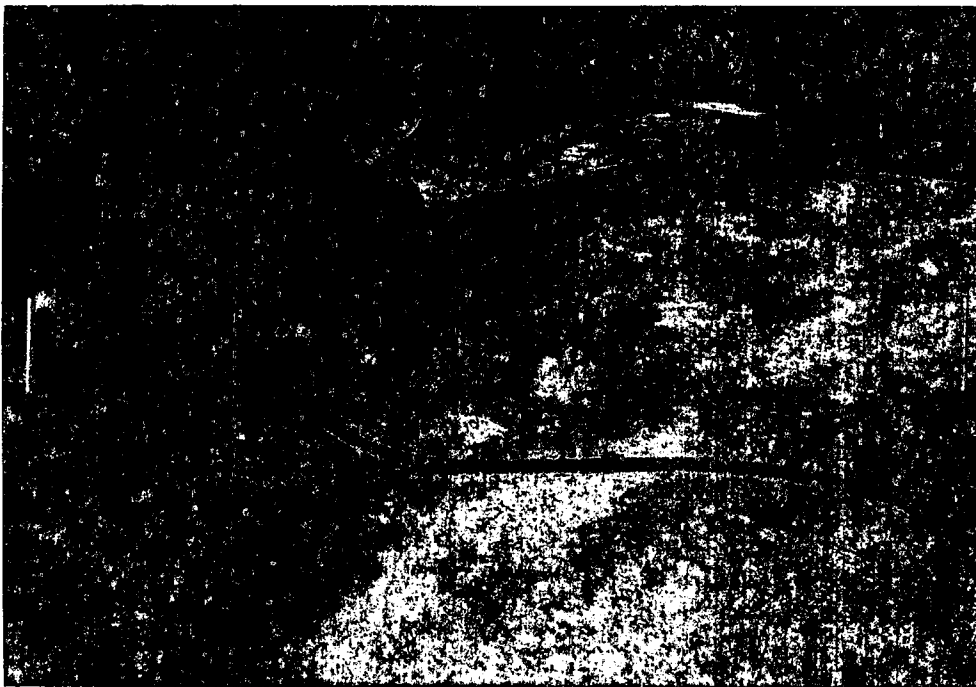


Photo No. _____ Time: 6/28/88 Hrs.

Date: 6/28/88 Day: _____

By: Dale T. Stuckey

General Direction Faced: NE

Weather Conditions: _____

Type of Camera: _____

Minolta Freedom III

Comments: _____

View of spillage under
acid tanker
Service Chemical.

Division of Environment
Northcentral District Office, Salina
PHOTO MOUNTING SHEET

Name of Site: Conservation Services

Location: City Wichita County SG Local _____



Photo No. _____ Time: 6/28/88 Hrs. _____

Date: 6/28/88 Day: _____

By: W. C. I. Stanley

General Direction Faced: _____

East

Weather Conditions: _____

Type of Camera: _____

Minolta Freedom III

Comments: _____

Acid unloading

area - Service Chemical.

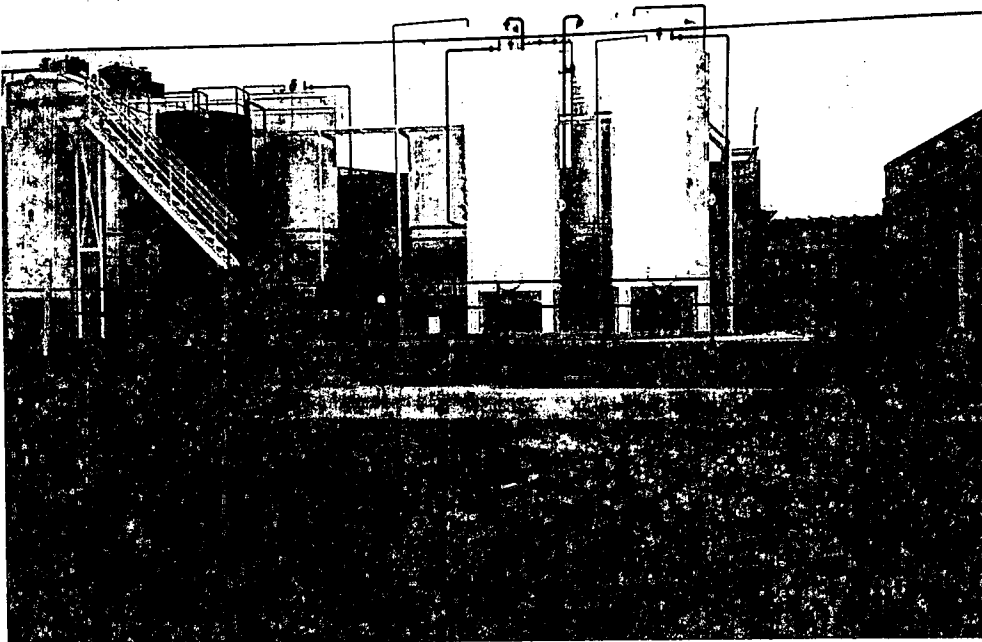


Photo No. _____ Time: 6/28/88 Hrs. _____

Date: 6/28/88 Day: _____

By: W. C. I. Stanley

General Direction Faced: _____

North

Weather Conditions: _____

Type of Camera: _____

Minolta Freedom III

Comments: _____

New hazardous waste

tanks

Division of Environment
Northcentral District Office, Salina
PHOTO MOUNTING SHEET

Name of Site: Conservation Services
Location: City Wichita County SG Location S, T, S, R E
W



Photo No. _____ Time: 6/28/88 Hrs.

Date: 6/28/88 Day: _____

By: Page 1 Stuehly

General Direction Faced: _____

Weather Conditions: _____

Type of Camera: _____

Minolta Freedom III

Comments: _____

Inside sparging
room.

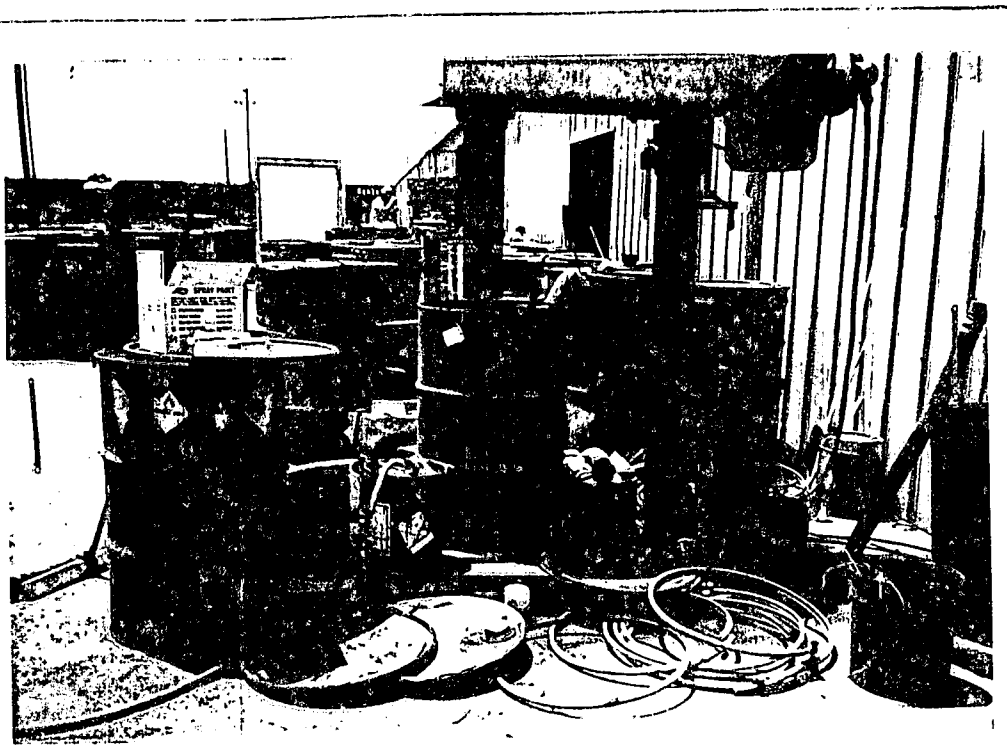


Photo No. _____ Time: 6/28/88 Hrs.

Date: 6/28/88 Day: _____

By: Page 1 Stuehly

General Direction Faced: _____

West

Weather Conditions: _____

Type of Camera: _____

Minolta Freedom III

Comments: _____

Blender/disperser area

Division of Environment
Northcentral District Office, Dallas
PHOTO MOUNTING SHEET

Name of Site: Conservation Services

Location: City Wichita County SG State KS

Section 5, T. 1 S, R. W



Photo No. _____ Time: 6/28/88 Hrs. _____

Date: 6/28/88 Day: _____

By: Dale I. Stuckey

General Direction Faced: _____

Weather Conditions: _____

Type of Camera: _____

Minolta Freedom III

Comments: _____

In Warehouse C.

Dented 5 gallon

containers of flammable

liquid on top pallet.

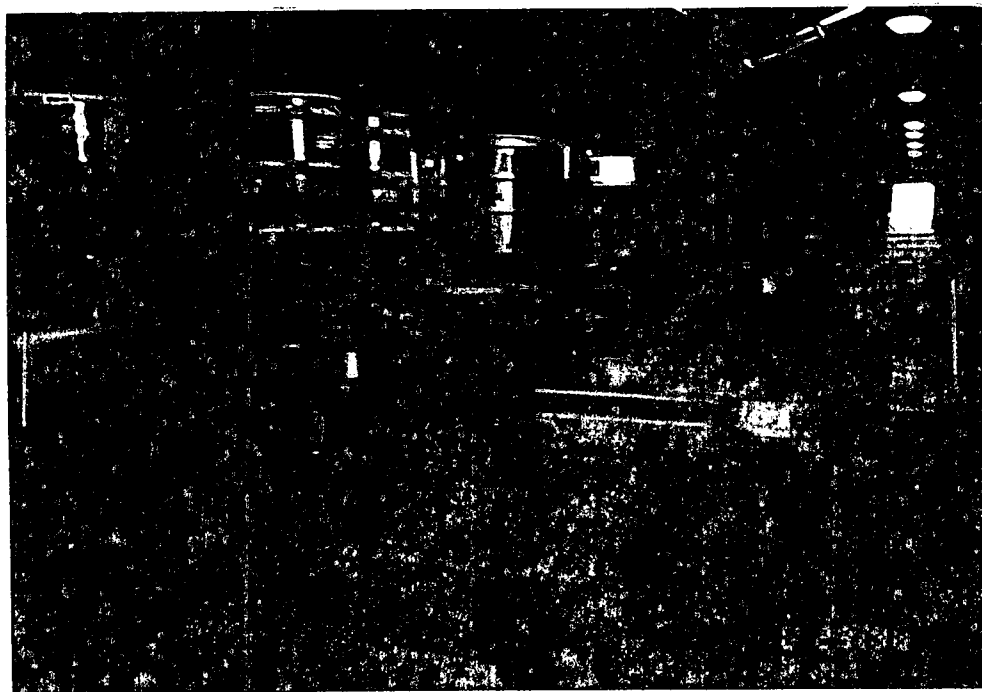


Photo No. _____ Time: 6/28/88 Hrs. _____

Date: 6/28/88 Day: _____

By: Dale I. Stuckey

General Direction Faced: _____

SW

Weather Conditions: _____

Type of Camera: _____

Minolta Freedom III

Comments: _____

Warehouse C

Department of Health and Environment
Division of Environment
Northeast District Office, St. Louis
P H O T O M O U N T I N G S H E E T

Name of Site: Conservation Services
Location: City Wichita : County SG Legal: _____ S-____, T-____ S, R _____ E
W



Photo No. _____ Time: _____ Hrs. _____

Date: 6/28/88 Day: _____

By: Dale T. Stuckey

General Direction Faced: NW

Weather Conditions: _____

Type of Camera: Minolta Freedom III

Comments: _____

Warehouse C.

Photo No. _____ Time: _____ Hrs. _____

Date: _____ Day: _____

By: Dale T. Stuckey

General Direction Faced: _____

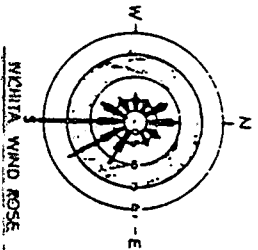
Weather Conditions: _____

Type of Camera: Minolta Freedom III

Comments: _____

- 1) OFFICE BUILDING, F
2) LAB. BUILDING, A
3) TRUCK STORAGE
4) INDUSTRIAL, BUILDING W
5) TRUCK, BUILDING W
6) ACCESSORY AREA, SECTION T
7) TRUCK AREA, BUILDING D
8) TRUCK AREA, BUILDING D
9) TRUCK AREA, BUILDING D
10) TRUCK AREA, BUILDING D
11) TRUCK AREA, BUILDING D
12) TRUCK AREA, BUILDING D
13) SPARGER

LEGEND:
RAILROAD TRACKS
PROPERTY LINE
TRAFFIC FLOW ARROWS



HYDROCARBON RECYCLERS INC.	
2925 N. NEW YORK ST. WICHITA, KS 67214-4322	
Scale: 1" = 60'-0"	DATE: 2-2-88
BY: [Signature]	CHKD: [Signature]
PLOT PLAN	

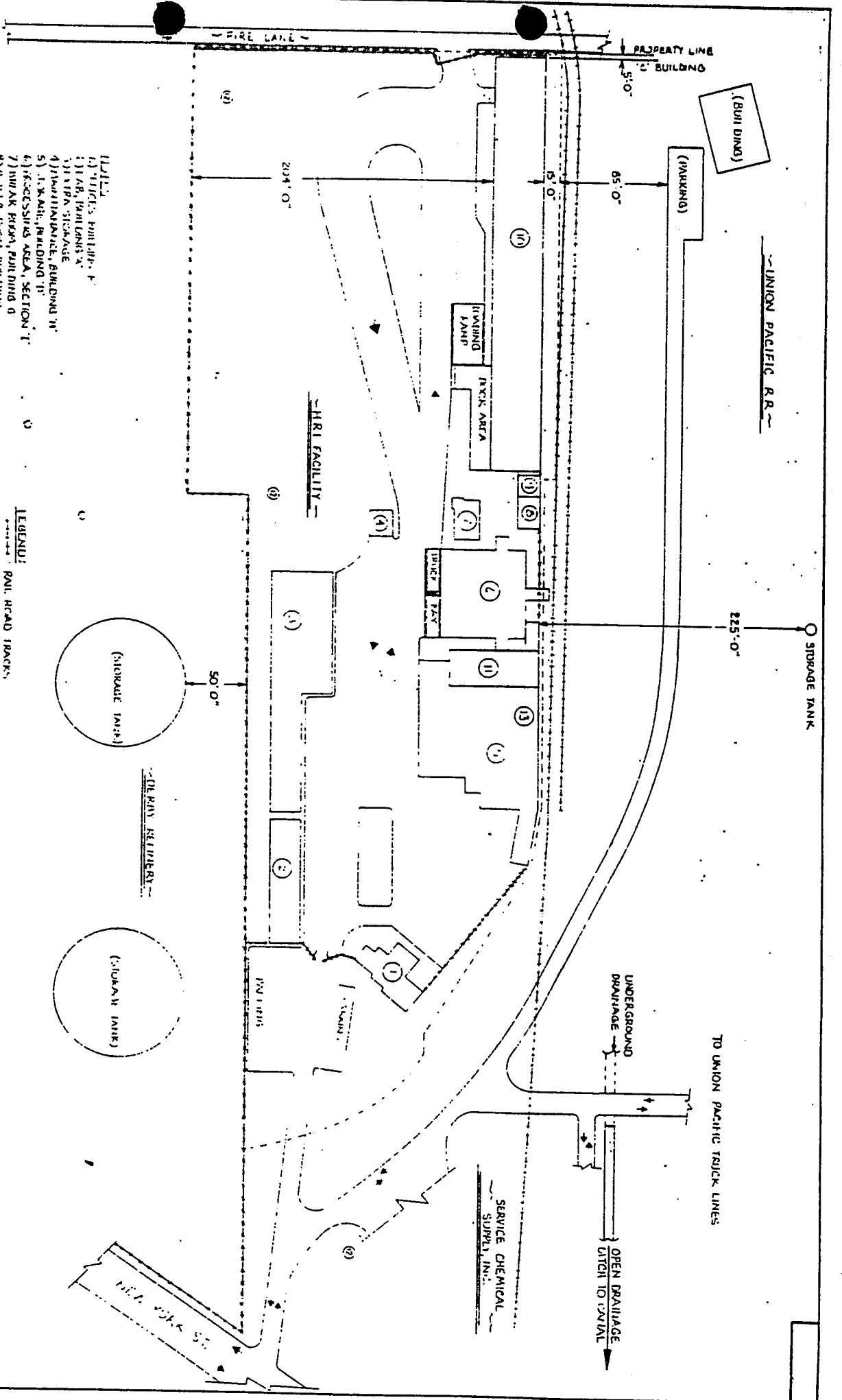
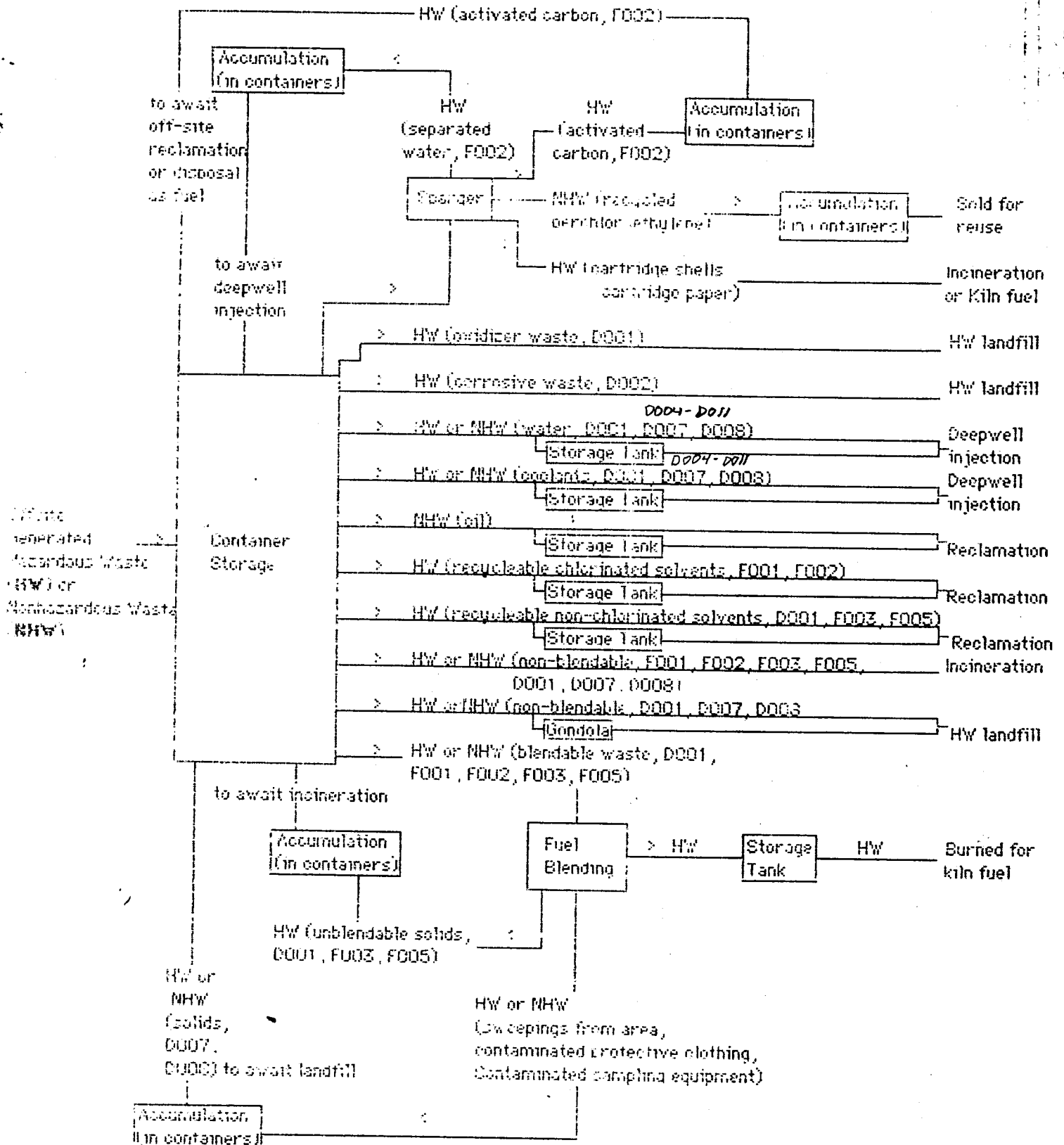


Figure 1.1
HRI WASTESTREAM CHANNELING



STATE OF KANSAS



RECEIVED
BUREAU OF

SEP 28 1988

DEPARTMENT OF HEALTH AND ENVIRONMENT

Forbes Field
Topeka, Kansas 66620-0001
Phone (913) 296-1500

WASTE
MANAGEMENT

Mike Hayden, Governor

Stanley C. Grant, Ph.D., Secretary
Gary K. Hulett, Ph.D., Under Secretary

September 27, 1988

Mr. J.W. Lindberg
Sealright Company, Inc.
2925 Fairfax Road
P.O. Box 15219
Kansas City, Kansas 66115

Make copy for
land ban, then
file

Re: Hazardous Waste Compliance Inspection of August 10, 1988
EPA Identification Number KSD007118169

Dear Mr. Lindberg:

During our September 20, 1988 telephone conversation we discussed the results of the laboratory analyses for the soil samples collected during the compliance inspection.

The results indicate the soil is not classified as hazardous waste. However, the visibly discolored soil must be removed and disposed of in a permitted sanitary landfill. Local sanitary landfills that may accept the soil are the Forest View Landfill located in Wyandotte County and the Johnson County Landfill.

Please accomplish disposal by November 1, 1988. Please notify our department in writing when accomplished.

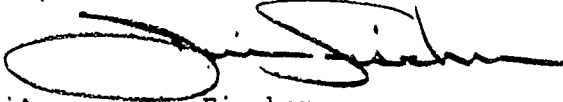
After conferring with Mr. John Goetz, Chief, Hazardous Waste Section, it was determined that in order to continue storing your drums of hazardous waste in their present location you must obtain a variance. Please complete the enclosed variance request and submit it to Mr. John Goetz, Kansas Department of Health and Environment, Bureau of Waste Management, Forbes Field, Topeka, Kansas 66620.

Your cooperation with the hazardous waste management program is appreciated.

Mr. J.W. Lindberg
September 27, 1988
Page 2

If you have questions concerning this letter, please call me at the Northeast District Office in Lawrence at 913/842-4600.

Respectfully,



Jim Fischer
Environmental Technician
Inspections and Enforcement Section
Bureau of Waste Management

JF:gz (seal.jim)
Enclosure

C: Tom Gross, Bureau of Waste Management
John Paul Goetz, Bureau of Waste Management
Chuck Linn, Bureau of Waste Management
NEDO